

**Commonwealth of Kentucky  
Division for Air Quality**

***RESPONSE TO COMMENTS***

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-07-046

TruSeal Technologies, Inc.

Barbourville, KY 40906

October 26, 2007

Ralph Gosney, Reviewer

SOURCE ID: 21-121-00004

SOURCE A.I. #: 2550

ACTIVITY ID: APE20040001

**SOURCE DESCRIPTION:**

TruSeal Technologies, Inc. produces adhesives and sealants for consumer applications. Primary emission units include batch mixers and a continuous mixer. After extrusion, sections of the product are cut off by hand, in a process called “slugging” and transferred for packaging.

The source was issued operating permit S-98-061 on July 31, 1998, with Revision 1 issued on January 13, 2000. Permit S-98-061 was issued pursuant to 401 KAR 50:035, which has been repealed and replaced with 401 KAR 52:020 (Title V Permits), 401 KAR 52:030 (Conditional Major Permits), and 401 KAR 52:040 (State Origin Permits). As such, S-98-061 was issued as a State Origin permit with voluntary source-wide HAP emission limits to preclude permitting requirements for major sources. During this review, the permittee has requested the continuance of federally enforceable permit limits below major source thresholds.

**PUBLIC AND U.S. EPA REVIEW:**

On September 20, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in the *Barbourville Mountain Advocate* in Barbourville, Kentucky. The public comment period expired 30 days from the date of publication.

No comments were received during this period. The permit is now being issued final.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.